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7  
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of Britney Jean Spears, on behalf of  
9 Defendant Britney Jean Spears

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**  
12

13 SAM LUTFI, an individual,

14 Plaintiff,

15 vs.

16 LYNNE IRENE SPEARS, an individual,  
JAMES PARNELL SPEARS, an  
17 individual, BRITNEY JEAN SPEARS, an  
individual; and DOES 1 through 25,  
18 inclusive,

19 Defendants.  
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CASE NO. BC 406904

*Assigned to the Honorable Suzanne G.  
Bruguera, Dept. 71*

**THE CO-CONSERVATORS' MOTION  
IN LIMINE NO. 1: TO QUASH  
PLAINTIFF'S RENEWED NOTICE  
TO PRODUCE CONSERVATEE  
BRITNEY SPEARS AS A WITNESS  
AT TRIAL**

**[Concurrently-Filed Request for Judicial  
Notice Nos. 1 & 2; Declaration of Joel E.  
Boxer; Declaration of Samuel D. Ingham  
III]**

Date: September 25, 2012  
Time: 10:00 a.m.  
Dept: 71

Action Filed: February 3, 2009  
Trial Date: October 1, 2012

26 **REDACTED VERSION**  
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2901847.1

**THE CO-CONSERVATORS' MOTION IN LIMINE NO. 1: TO QUASH PLAINTIFF'S RENEWED NOTICE TO  
PRODUCE CONSERVATEE BRITNEY SPEARS AS A WITNESS AT TRIAL**

**EXHIBIT 4**

1 PLEASE TAKE NOTICE that at the Final Status Conference currently set for  
2 September 25, 2012 at 10:00 a.m. in Department 71 of this Court, located at 111 North Hill  
3 Street, Los Angeles, CA 90012, or at a date, place and time set by the Court, Andrew M.  
4 Wallet and James P. Spears, as Co-Conservators of the Estate of Britney Jean Spears ("the  
5 Co-Conservators"), will and hereby move pursuant to California Code of Civil Procedure  
6 § 1987.1 to quash Plaintiff's Renewed Notice To Produce Britney Spears as a Witness at  
7 Trial ("Notice To Appear").

8 This motion is made on the following grounds:

- 9 1. Britney Spears ("Britney") is, and has since February 1, 2008 been, under a  
10 conservatorship supervised by the probate department of this Court (the  
11 "Probate Court"). The Probate Court has continuing and exclusive jurisdiction  
12 over all matters affecting the health and welfare of the Conservatee.
- 13 2. On April 27, 2011, the Probate Court, by order signed by Judge Goetz,  
14 expressly directed that Britney's Co-Conservators could not produce Britney as  
15 a witness at the trial of this action.
- 16 3. As a matter of law established by an unbroken line of appellate precedent cited  
17 below, no other judge or department of this court has jurisdiction or power to  
18 interfere with the existing and continuing Probate Court jurisdiction or to vacate,  
19 revise or countermand the Probate Court's order to the Co-Conservators. Since  
20 the Notice to Appear has the effect of a subpoena, seeking to compel Britney to  
21 appear as a witness at trial, even though the Probate Court has precluded such  
22 appearance, the Notice to Appear must be quashed as a matter of law.
- 23 4. Plaintiff has known about Judge Goetz's order for more than a year, yet has not  
24 they have not taken any action in Judge Goetz's court to modify, to vacate or to  
25 seek reconsideration of or exception to her order. Accordingly, Plaintiff has  
26 waived any right to compel Britney's appearance as a witness in this case.

27 Pursuant to Local Rule 3.57, counsel for the Co-Conservators met and conferred  
28 with Plaintiff's counsel as to the entirety of the relief herein requested. Plaintiff's counsel

1 refused to withdraw the Notice to Appear as to Britney. (Declaration of Joel E. Boxer  
2 ("Boxer Decl.") ¶ 4). Indeed, Plaintiff has moved to enforce the Notice. If the Co-  
3 Conservators' motion to quash is not granted, the Co-Conservators and Britney will suffer  
4 substantial prejudice. (Boxer Decl. ¶ 5.)

5 This motion is based on this notice, the concurrently filed Requests for Judicial  
6 Notice and Declaration of Joel E. Boxer, the attached memorandum of points and  
7 authorities, the files and records of the Court, the transcript of the June 15, 2011 hearing on  
8 a discovery motion (Boxer Decl. ¶ 14, Exh. N), and such further matters as will be  
9 considered by the Court at the time of the hearing of this motion.

10

11 DATED: August 31, 2012

Respectfully submitted,

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Joel E. Boxer

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Bonita D. Moore

14

Mary H. Hansel

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BIRD, MARELLA, BOXER, WOLPERT,  
NESSIM, DROOKS & LINCENBERG, P.C.

16

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By: 

Joel E. Boxer

18

Attorneys for James P. Spears and Andrew M.  
Wallet as Co-Conservators of the Estate of Britney  
19 Jean Spears, on behalf of Defendant Britney Jean  
20 Spears

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I**

3 **INTRODUCTION**

4 Plaintiff's Renewed Notice To Produce Britney Spears as a Witness at Trial  
5 ("Notice To Appear") must be quashed because (1) the Co-Conservators are obligated to  
6 comply with a long-existing order of the Probate Court that explicitly prohibits them from  
7 producing their Conservatee, Britney Spears ("Britney"), from appearing as a witness in the  
8 upcoming trial in this case; (2) as a matter of law established by an unbroken line of  
9 precedents, neither the Plaintiff Sam Lutfi ("Plaintiff" or "Lutfi"), nor any court (except  
10 the Probate Court that issued the order) may vacate, modify, countermand or refuse to  
11 enforce the Probate Court order; (3) by purporting to invoke this department's subpoena  
12 powers to direct the presence of a witness that the Probate Court has ordered cannot be  
13 present, Plaintiff is violating the Probate Court's directives and is seeking to interfere with  
14 the exclusive jurisdiction of another department over the subject matter, something neither  
15 he nor this Court can do; and (4) Plaintiff has known about the existence and scope of the  
16 Probate Court's preclusion order for over a year, yet he has not sought vacation,  
17 modification, reconsideration or appellate review of that order and, thus, cannot seek  
18 revision or modification of the order now, on the eve of trial.

19 For these reasons, the Notice to Appear must be quashed as a matter of law.

20 **II**

21 **FACTUAL BACKGROUND**

22 Beginning in 2007, Britney's mental and physical health was precarious; by January  
23 2008, she was placed in two involuntary psychiatric holds in Los Angeles hospitals. As a  
24 result, on February 1, 2008, Judge Goetz, sitting in the Probate Department granted  
25 temporary conservatorship petitions over her person and estate to Britney's father, James  
26 P. Spears. (Declaration of Joel E. Boxer ("Boxer Decl.") ¶ 6, Exhs. A-D.) A professional  
27 fiduciary, attorney Andrew M. Wallet, was named by the Court as a Co-Conservator of the  
28 estate. Samuel D. Ingham III, a respected, certified specialist in Probate, Estate Planning

1 and Trust law with more than 35 years of experience in conservatorship matters, was  
2 appointed by the court as Ms. Spears' personal counsel. (Boxer Decl. ¶ 7, Exh. E;  
3 Declaration of Samuel D. Ingham III ("Ingham Decl.") ¶¶ 1-2.)

4 Judge Goetz has had – and, to this day, continues to have – responsibility for  
5 supervising the Conservatee's welfare and for directing her Co-Conservators since the  
6 conservatorship proceedings began on February 1, 2008, well before the instant lawsuit  
7 was filed.<sup>1</sup> (Ingham Decl. ¶¶ 1, 4.)

8 On April 27, 2011, upon application of Britney's court-appointed personal  
9 counsel, Mr. Ingham, Judge Goetz issued the Sealed Order, prohibiting the Co-  
10 Conservators from producing Britney as a witness for trial, deposition or any other type of  
11 examination conducted in connection with this action. (Request for Judicial Notice No. 2  
12 ("RJN No. 2") ¶ 1; Exh. AA; Ingham Decl. ¶ 5.) The Sealed Order was first sealed  
13 conditionally by order of Judge Goetz on April 27, 2011 (the "Sealing Order"). (RJN No.  
14 2 ¶ 1, Exh. BB; Ingham Decl. ¶ 5.)<sup>2</sup> Judge Goetz subsequently made the Sealing Order  
15 permanent at a hearing in open court on May 12, 2011.<sup>3</sup> (Ingham Decl. ¶ 8.)

16 On May 2, 2011 — 16 months ago — Lutfi's counsel was given notice of both the  
17 Sealing Order and the then-conditionally Sealed Order, including its substance. (Ingham  
18 Decl. ¶ 6.) Lutfi has never taken any action in the Probate Court to vacate, to modify, or to  
19 request reconsideration of either the Sealed Order or the Sealing Order; nor has he sought

20  
21 <sup>1</sup> Judge Goetz's responsibilities are as to both the Conservatorship of the Person of  
22 Britney Jean Spears and the Conservatorship of the Estate of Britney Jean Spears ("Spears  
23 Conservatorship"). The authority of the Court over guardianships and conservatorships  
24 derive from "the parens patriae power of the state to protect incompetent persons."  
25 *Conservatorship of Wendland*, 26 Cal. 4th 519 (2001).

26 <sup>2</sup> A copy of the April 27, 2011 Sealing Order has also been submitted to this Court as  
27 Exhibit AAA to the concurrently-filed Request for Judicial Notice No. 1 ("RJN No. 1").

28 <sup>3</sup> By reason of the Sealing Order, the Co-Conservators are prohibited from publicly  
disclosing the content of the April 27, 2011 Sealed Order. Therefore, the Co-Conservators  
are filing sealed and unsealed versions of this motion.

1 appellate review of those orders. (Ingham Decl. ¶ 9.)

2 In this action, Lutfi moved to compel Britney's submission for an Independent  
3 Medical Examination ("IME"). At the hearing on June 15, 2011, Judge Sinanian denied  
4 Lutfi's discovery motion and suggested that he take action in the Probate Court should he  
5 desire modification of the Probate Court's Orders. (Boxer Decl. ¶ 14, Exh. N.) Lutfi  
6 failed to seek reconsideration or review of Judge Sinanian's order, and he took no action in  
7 furtherance of Judge Sinanian's suggestion that Lutfi take action in the Probate Court if  
8 Lutfi had any problem with the Probate Court's orders. (Boxer Decl. ¶ 14; Ingham Decl. ¶  
9 9.)

### 10 III

#### 11 ARGUMENT

12 A. THE NOTICE TO APPEAR MUST BE QUASHED BECAUSE CASE LAW  
13 UNEQUIVOCALLY ESTABLISHES THAT THIS COURT HAS NO  
14 JURISDICTION TO COMPEL BRITNEY SPEARS' ATTENDANCE AT  
15 TRIAL SINCE HER ATTENDANCE IS PRECLUDED BY A LONG-  
16 STANDING ORDER OF JUDGE GOETZ.

17 1. Judge Goetz Has Continuing And Exclusive Jurisdiction Over Matters  
18 Affecting The Conservatee's Health And Welfare

19 Judge Goetz, sitting as a Superior Court Judge in the Probate Department, has had  
20 continuing and exclusive jurisdiction over the Conservatorships established in 2008.<sup>4</sup> See  
21 *Guardianship of Kemp*, 43 Cal. App. 3d 758, 761 (1974) ("The probate court has exclusive  
22 jurisdiction of guardianship proceedings, and after a guardian has been appointed, the court  
23 has continuing jurisdiction over the guardian and the administration of the ward's  
24 affairs.")(emphasis added); see also *Browne v. Superior Ct.*, 16 Cal. 2d 593, 597 (1940)

25  
26 <sup>4</sup> The "probate court" is a department of the Superior Court, and is a court of general  
27 jurisdiction "with broad equitable powers." *Guardianship of Kemp*, 43 Cal. App. 3d 758,  
28 761 (1974); *Estate of Kraus*, 184 Cal. App. 4th 103, 114 (2010).

1 ("No other court, we believe, has power to interfere with that continuing control over the  
2 guardian; no other court could . . . instruct him as to his duties."); and *In re Marriage of*  
3 *Schenck*, 228 Cal. App. 3d 1474, 1477 (1991) (the law and motion department properly  
4 yielded to the family law department on an issue that would have affected its reserved  
5 jurisdiction).

6       **2. Where, As Here, The Probate Court First Assumed Jurisdiction (And**  
7       **Continues To Have Jurisdiction) Over Matters Involving Britney's**  
8       **Welfare And Has Issued Orders Precluding Her Attendance At The**  
9       **Trial Of This Action, No Other Court (Including This One) Has**  
10       **Jurisdiction to Vacate, To Modify, To Countermand Or To Issue Any**  
11       **Directive That Is Inconsistent With The Probate Court's Orders.**

12       A long and unbroken line of controlling appellate precedents establish that, where  
13 as here, a court has assumed jurisdiction over a matter and has issued orders in the case, no  
14 other court or department of the superior court can take action that contradicts those  
15 orders. *See, e.g., Williams v. Superior Ct.*, 14 Cal. 2d 656, 662 (1939) ("it is beyond the  
16 jurisdictional authority of another department of the same court to interfere with the  
17 exercise of the power of the department to which the proceeding has been so assigned. . .  
18 If such were not the law, conflicting adjudications of the same subject-matter by different  
19 departments of the one court would bring about an anomalous situation and doubtless lead  
20 to much confusion."); *Ford v. Superior Ct.*, 188 Cal. App. 3d 737, 741 (1986) (finding that  
21 and order "made in one department during the progress of a cause can neither be ignored  
22 nor overlooked in another department. . ."); *Silverman v. Superior Ct.*, 203 Cal. App. 3d  
23 145, 150-51 (1995) ("One department of the superior court cannot enjoin, restrain, or  
24 otherwise interfere with the judicial act of another department of the superior court. . . A  
25 judgment rendered in one department of the superior court is binding on that matter upon  
26 all other departments until such time as the judgment is overturned."); *In re Alberto*, 102  
27 Cal. App. 4th 421, 427-28 (2002) ("For one superior court judge, no matter how well  
28 intended, even if correct as a matter of law, to nullify a duly made, erroneous ruling of

1 another superior court judge places the second judge in the role of a one-judge appellate  
2 court.”).<sup>5</sup>

3 *Glade v. Glade*, 38 Cal. App. 4th 1441 (1995) is particularly instructive on this  
4 issue. In *Glade*, the family law court had first acquired jurisdiction over certain property  
5 by virtue of marital dissolution proceedings. *Id.* at 1445. The trustee of a family trust then  
6 brought a civil action seeking to foreclose on a residence that was community property.  
7 *Id.* The family law court issued an order staying the foreclosure action. *Id.* at 1447. The  
8 trial court judge in the foreclosure action refused to stay the foreclosure proceedings and  
9 granted summary judgment for the trust, stating that because his was a court of equal  
10 jurisdiction, the family law court had no authority to order a stay. *Id.* at 1448-49. The  
11 Court of Appeal reversed the trial court’s grant of summary judgment in the foreclosure  
12 action. *Id.* at 1448-49, 1457-58.

13 The Court of Appeal in *Glade* held that the trial court judge had been barred from  
14 proceeding by virtue of the stay order. *Id.* at 1449, 1458. The Court noted that “the first  
15 court of equal dignity to assume and exercise jurisdiction over a matter acquires exclusive  
16 jurisdiction.” *Id.* at 1450 (internal quotations omitted); *see also Williams v. Superior*  
17 *Court*, 14 Cal. 2d 656, 662-63 (1939) (finding that an order issued by another department  
18 purporting to invalidate a contempt order issued by the department before whom the  
19 proceedings were still pending was null and void). *Glade* noted this principle is  
20 particularly compelling for departments exercising distinct subject matter jurisdiction, such  
21 as “the family law court’s broad jurisdictional authority where the right to and disposition  
22 of community property are concerned.” *Id.*; *see also Slone v. Inyo County Juvenile Court*,  
23 230 Cal. App. 3d 263, 269 (1991) (citing same principle).

24  
25 <sup>5</sup> If the law were otherwise and one department could interfere with orders issued by  
26 another department, then parties would be incentivized to forum shop until they were  
27 granted the relief they were seeking. *See In re Alberto*, 102 Cal. App. 4th at 427. “Such a  
28 procedure would instantly breed lack of confidence in the integrity of the courts.” *Id.*  
(citing *People v. Scofield*, 249 Cal. App.2d 727, 734 (1967)).



1 Similarly, here the probate department has been given distinct subject matter  
2 jurisdiction by the Legislature over all matters affecting a conservatee's health and  
3 welfare. Moreover, as to primacy, the Spears conservatorship proceedings, which continue  
4 to this day, predate by one year Lutfi's civil suit, which was not filed until 2009. Thus, the  
5 Probate Court first assumed and still retains jurisdiction over matters affecting the  
6 conservatorships. Consistent with these principles, Judge Goetz's Sealed Order states that  
7 "[t]his [Probate Court] has exclusive jurisdiction to make an order directing the  
8 conservators to act." (RJN No. 2 ¶ 1, Exh. AA, ¶ 10.)

9 **3. The Sealed Order Is Within The Jurisdiction Of The Conservatorship**  
10 **Proceedings And No Other Court Can Disregard Or Countermand the**  
11 **Order.**

12 The Sealed Order is exclusively within the province of the conservatorship  
13 proceedings pending since 2008 before Judge Goetz. [REDACTED]

14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED] (RJN No. 2 ¶ 1, Exh. AA, ¶ 10.); see  
18 also Probate Code section 1800.<sup>6</sup>

19 [REDACTED]  
20 [REDACTED] The  
21 Sealed Order was issued upon the application of the independent court-appointed counsel  
22 for Britney, Samuel D. Ingham III, whose mandate is the protection of Britney's health and  
23 [REDACTED]

24 <sup>6</sup> [REDACTED]  
25 [REDACTED] By filing this motion to quash, the Co-  
26 Conservators do not waive and intend to preserve their objections to this Court's  
27 jurisdiction over this issue. It is unnecessary for the Co-Conservators to seek relief in the  
28 Probate Court given that the Sealed Order, still in full force, already addresses Britney's  
appearance at trial.

1 welfare. (Ingham Decl. ¶ 5.) Moreover, the expert upon whose opinion Britney's court-  
2 appointed attorney relied in presenting his application to the Court, and upon whose  
3 opinion Judge Goetz expressly relied in ruling on the Sealed Order, is a medical  
4 practitioner *chosen by the Court in 2008* as its Evidence Code § 730 expert. (*Id.*) The  
5 medical practitioner was *not* selected by a party to this litigation. (*See* RJN No. 2 ¶ 1, Exh.  
6 AA, ¶ 8.)<sup>7</sup>

7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED] (RJN No. 2, ¶ 1, Exh. AA, ¶ 11.) [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED] (RJN No. 2, ¶ 1, Exh. AA, at 3.) Thus, the

15 court's instructions not to produce Britney in this action are clear and binding on the Co-  
16 Conservators; no other department may interfere with the exercise of the Judge Goetz's  
17 jurisdiction and power on these issues.

18 In light of the foregoing and the governing law, this Court has no jurisdiction to  
19 order Britney's appearance at trial in violation of the express terms of the Sealed Order.  
20 To do so would interfere with the Probate Court's preexisting and ongoing jurisdiction,  
21

22 7 [REDACTED]  
23 [REDACTED]  
24 [REDACTED] (RJN No. 2 ¶  
25 1, Exh. AA, ¶ 9.)

26 <sup>8</sup> "Instructions" are court-mandated orders to fiduciaries such as guardians or  
27 conservators. Cal. Prob. Code §§ 2359(a), 2403(a). As such, they are appealable orders.  
28 Cal. Prob. Code § 1300(c); *Guardianship of Christiansen*, 248 Cal. App. 2d 398 (1967).

1 and contravene well-established principles of judicial governance.

2 **B. Lutfi Has Had Notice Of The Sealed Order For More Than A Year And Has**  
3 **Not Sought Any Relief From Judge Goetz Or The Court Of Appeal**

4 Although Lutfi (through his counsel) had notice by May 2, 2011 of the substance of  
5 the then- conditionally Sealed Order and of the pending May 12, 2011 hearing regarding  
6 permanent sealing of the Sealed Order, Lutfi did not appear or object in the Probate Court  
7 after receiving such notice; he did not appear at the May 12, 2011 hearing before Judge  
8 Goetz when the Sealing Order was made permanent; nor has he otherwise attempted to  
9 take any steps in the Probate Court or at the appellate level to challenge Judge Goetz'  
10 orders. Even after the hearing on Lutfi's motion to compel Britney's IME, when Judge  
11 Sinanian in this action said the civil department would defer to Judge Goetz's order, Lutfi  
12 did nothing to seek reconsideration or review.<sup>9</sup> At the June 15, 2011 hearing, the parties  
13 also discussed that Britney would not be a witness at trial and Plaintiff's counsel was  
14 directed by Judge Sinanian to seek review of Judge Goetz's order from her, the issuing  
15 jurist, if Plaintiff disagreed with it. (Boxer Decl. ¶ 14, Exh. N.)<sup>10</sup>

16 As Lutfi has not brought a proper challenge to the Sealed Order in the 16 months he  
17 has had notice of it, this Court should summarily dispose of his improper and underhanded  
18 attempt to invalidate Judge Goetz's order.

19 **IV**

20 **CONCLUSION**

21 For the foregoing reasons, the Co-Conservators' motion to quash Plaintiff's Notice  
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23 <sup>9</sup> Ingham Decl., ¶ 9. Lutfi has challenged (so far unsuccessfully) at the trial and  
24 appellate levels *other* orders issued by the Probate Court in the conservatorship  
25 proceedings. (Boxer Decl., ¶ 13.).

26 <sup>10</sup> Indeed, Plaintiff, recognizing the impact and authority of the Sealed Order and Judge  
27 Sinanian's June 15, 2011 ruling based on it, has recognized that these orders make Britney  
28 in effect unavailable in this action because Plaintiff, after the June 15, 2011 ruling,  
abandoned his then-pending efforts to take her deposition.

1 to Appear,<sup>11</sup> as directed to Britney Spears, should be granted because the Probate Court has  
2 exclusive jurisdiction over matters within the conservatorship proceedings, which  
3 encompass the health and welfare of the Conservatee, and any order by this Court  
4 compelling Britney's attendance at trial would be inconsistent with, and would effectively  
5 countermand, Judge Goetz's Sealed Order explicitly prohibiting the Co-Conservators from  
6 producing Britney at trial, which must be honored here.

7 DATED: August 31, 2012

Respectfully submitted,

8 Joel E. Boxer  
9 Bonita D. Moore  
10 Mary H. Hansel  
11 BIRD, MARELLA, BOXER, WOLPERT,  
12 NESSIM, DROOKS & LINCENBERG, P.C.

13 By: 

Joel E. Boxer

14 Attorneys for James P. Spears and Andrew M.  
15 Wallet as Co-Conservators of the Estate of Britney  
16 Jean Spears, on behalf of Defendant Britney Jean  
17 Spears  
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27 <sup>11</sup> The Notice to Appear also directs the Co-Conservators to appear at trial; to that extent,  
28 they do not object to the notice.

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I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 1875 Century Park East, 23rd Floor, Los Angeles, California 90067-2561.


**SEE ATTACHED SERVICE LIST**

**BY MAIL:** By placing a true copy thereof in sealed envelopes addressed to the parties listed on the attached Service List and causing them to be deposited in the mail at Los Angeles, California. The envelopes were mailed with postage thereon fully prepaid. I am readily familiar with our firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing affidavit.

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from e-mail address [snj@birdmarella.com](mailto:snj@birdmarella.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 31, 2012, at Los Angeles, California.

  
Shemena N. Johnson

**SERVICE LIST**  
**Lutfi v. Spears**  
**Case No. BC 406904**

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I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is Steiner Attorney Service, 1513 Livonia Avenue, Los Angeles, California 90064.

**Joseph D. Schleimer**  
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**Attorney for Sam Lutfi**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

## Melvin Steiner